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Cc: [Neil Anderson](#); [Russell Wasem](#)
Subject: For your consideration: Draft charge questions for the Notice of Intent to Cancel SAP
Date: 10/19/2011 06:11 PM

Draft Charge Questions for Rodenticide NOIC SAP 10-19-11

Draft Charge Questions for Rodenticide SAP

Human and Pet Incident Report

1. The Agency aims to include and consider all relevant and impactful observational information. Please comment on the information sources we've utilized and how we've described them in our incident report: are there additional data sources the panel is aware of and considers critical to completeness? Are the sources we have used well-characterized?
 - Human
 - Pet
2. The incident report lays out various analyses and evaluations. Please comment on the analyses conducted in the incident report: does the panel have additional or alternative approaches the Agency should consider?
 - Human
 - Pet
3. The incident report summarizes a number of data and information sources based on the analyses and reviews conducted. To what extent do the data brought together fairly and appropriately and are the conclusions reached supported by the analysis.
 - Human
 - Pet

Environmental Effects

4. Based on support document (REFERENCE) provided for review, EPA has determined that there are distinct differences in uptake and clearance across the rodenticides. Do you concur with EPA's determination? Please provide a basis for your conclusions.
5. Based on all the lines of evidence presented in the quantitative risk assessment in support document (REFERENCE), the Agency concluded that there is a distinct difference in the primary exposure risks for wildlife across the assessed chemicals. Do you concur with EPA's determination? Please provide a basis for your conclusions.
6. Based on all the lines of evidence presented in the quantitative risk assessment in

support document (REFERENCE), the Agency concluded that there is a distinct difference in the secondary exposure risks for wildlife across the assessed chemicals and that there is an increased opportunity for secondary poisoning of wildlife to occur for brodifacoum and difethialone relative to the other assessed chemicals. Do you concur with EPA's determination? Please provide a basis for your conclusions.

7. Based on the incident data presented in support document (REFERENCE), the Agency concluded that rodenticide use can result in wildlife mortality in urban, suburban, and rural areas. Do you concur with EPA's determination? Please provide a basis for your conclusions.

Efficacy Question

8. To what extent does the SAP concur that the restrictions of the RMD are not likely to prevent effective control of commensal rodents using rodenticide baits?

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